

7. ENVIRONMENTAL AWARENESS, TRAINING, AND COMMUNICATION PROGRAMS

The key objective of the environmental awareness, training, and communication programs at the facility is to proactively and reactively implement the corporate and plant policies, and achieve the environmental objectives and goals presented in this manual through continuous improvement in both plant-wide and operation-specific environmental performance. The success of the EMS requires that the goal of continuous environmental improvement be ingrained into all facility employees and thereby into the plant culture. Improvement will require changes in awareness, thinking, actions, empowerment and accountability by management, supervisory and non-management employees. These changes require the clear communication of corporate and plant policies, objectives and goals, as well as the environmental responsibilities and commitments of the company. All employees must understand how their actions in the plant affect their operation's environmental performance relative to environmental compliance and protection. In addition, employees must be provided with the knowledge of how to perform their work so as to proactively avoid or mitigate the occurrence of environmental incidents and how to report and react to such incidents upon discovery.

The environmental training and communication programs at the facility are directed at developing, maintaining and enhancing environmental awareness and providing a clear understanding that environmental compliance/protection has equal priority with safety, product quality, customer service, productivity and profitability.

The objectives of the facility's Environmental Training Programs are as follows:

7.1 Environmental Training Programs

1. Provide skills and knowledge to enable employees to improve environmental performance.
2. Comply with regulatory training requirements.
3. Assist operation managers in executing responsibilities for environmental compliance.
4. Communicate compliance requirements, practices and guidelines to employees.
5. Continually improve plant environmental performance.
6. Enhance preparedness capabilities for responding to environmental incidents.

Environmental training programs are classified as either regulation-required or company-required. The following describes the identification, development, implementation and evaluation of training programs.

7.1.1 Identification of Need of Plant-Wide Training Programs

Environmental training programs derive from: the objectives cited above; new regulatory training requirements; new or revised regulations; modifications to equipment and/or work practices; recurring environmental incidents; and/or adverse environmental performance. The plant's Environmental Department, in conjunction with operation managers, is responsible for identifying the need to develop environmental training programs.

The identification process is conducted using the following steps:

A. Continuous Environmental Performance Improvement Objectives

1. Review past environmental performance based on monitoring/ measurement, observations, inspections and audits.
2. Identify key result areas for improvement in performance.
3. Establish measurable objectives and/or standards.
4. Determine if, and how training can affect the ability to achieve objectives and/or meet standards.
5. If training is deemed appropriate, determine the employees to be trained, the appropriate training format and contents and implement training.

B. New Regulations

1. Identify the regulatory requirements and standards.
2. Determine if training is required by regulation. If so, develop and implement the required training program.
3. If training is not required by regulation, determine if and how company-required training can positively affect compliance with regulatory requirements or improve environmental performance.
4. If company-required training is deemed appropriate, determine the employees to be trained, the appropriate program format and contents and implement training.

C. Modifications to Equipment and/or Work Practices

1. Determine the potential impacts of modifications on plant environmental

performance.

2. Determine if and how training can affect environmental performance.
3. If training is deemed appropriate, determine the employees to be trained, the appropriate program format and contents and implement training.
4. If training is not deemed appropriate, determine the proper method of communicating the effects of modifications of equipment and/or work practices to employees.

D. Recurring Environmental Incidents and/or Adverse Trends in Environmental Performance

1. Determine the causes of the incidents or performance problems.
2. Determine if causes are related to employee awareness, knowledge or proficiency problems.
3. If so, determine if and how training can prevent or eliminate causes.
4. If training is deemed appropriate, determine the employees to be trained, the appropriate program format and contents and implement training.
5. If training is not required, communicate the causes of and remedies for environmental incidents and adverse performance through the environmental communications programs.

7.1.2 Development of Training Programs

The Training Section in the Human Resources Department, working in conjunction with Environment , determines the proper training approach, format, content and target audience for training programs. A discussion of training formats and the classification of training programs is provided below.

7.1.3 Implementation of Training Programs

The Training Section presents certain formal training programs to designated groups of employees. Depending on the objectives of the training program, training may be conducted at a work location or in a formal classroom setting. The Training Section is responsible for all administrative aspects (schedule, attendance and instructors) of the formal training programs. In general, a prototype training program will be presented to a selected audience for evaluation of the effectiveness of the program. Following the presentation of the prototype program, the presentation will be revised as necessary. Program

instructors are evaluated on an on-going basis; ineffective instructors are provided with guidance for improvement or replaced.

7.1.4 Evaluation of Training Programs

The Environmental Department, in conjunction with operation managers, are responsible for evaluating the effectiveness of environmental training programs. Evaluation methods include: environmental observations and inspections; interviews with supervisors and employees; and the monitoring/measurement of environmental performance of the operations. Recurring or common performance problems or deficiencies discovered by these methods are indicators that new or revised environmental training may be required.

7.1.5 Environmental Training Program Formats

The format selected for environmental training is determined by the goals and the objectives of the training. Training formats include:

<i>Publications</i>	Publications such as position papers, technical reports or articles are used as a training method for specific environmental concepts and issues. This training involves distributing the materials to selected employees with an explanation as to the relevance to environmental issues. This format does not include documentation of training.
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<i>Procedures</i>	Procedures (EMPs and SOPs) provide detailed guidance for specific work-related activities. New or revised documents are reviewed with affected employees to ensure understanding. This format includes documentation of training.
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<i>Paired On-The-Job Training</i>	Paired-on-the-job training provides individualized instruction generally relating to work practice proficiency. This format does not include documentation.
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<i>Formal On-The Job</i>	Formal-on-the job training also provides individualized training but utilizes formal methods (observations or testing) to determine training effectiveness. This format includes documentation of training.
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Classroom Training-On-Site This training format utilizes plant training facilities. Classroom training is generally provided by an experienced instructor utilizing audio-visual equipment . This format includes documentation of training.

Classroom Training-Off-Site Off-site training is generally provided by training consultants specializing in training programs not offered at the plant. Off-site training may be necessary for specific, required regulatory training from certified training providers. This format includes documentation of training.

7.1.6 Training Program Classifications

Environmental training programs are classified to enable the appropriate development, implementation and scheduling of the environmental training programs.

Tier I: General Employee Training

General employee training consists of basic environmental awareness and operation-specific training. Training formats and subjects are selected based on identified requirements, functions, duties and tasks of the groups to be trained. All general environmental training is conducted under the facility's Sustained Environmental Improvement (SEI) program.

Tier II: Operation Management and Supervisor Training

This training consists of advanced training in environmental management issues. This training provides management and supervisory personnel with an understanding of the regulatory requirements, standards and compliance guidelines for their areas of responsibility. The Environmental Compliance Manager for each Operation is responsible for the identification of training requirements within the Operation. The Environmental Compliance Manager for each Operation ensures that developed training programs address the Operation need and is presented in a manner that personnel within the Operation will readily understand.

Tier III: Specialized/Technical Training

This training is provided to personnel who, by the nature of their job requirements, operate or maintain pollution control equipment, have a specialized role in the response to environmental incidents or fill operations or maintenance positions requiring a higher level of expertise. Drill and exercise programs are utilized as

necessary by regulatory requirements.

7.1.7 Regulatory-Required Environmental Training

Regulatory-required environmental training is mandated by regulation. Assignment of personnel to required environmental training is determined by job responsibilities as they relate to specific regulations. This training is performed on-site, under the direction of the plant's Training Section, or at an off-site location providing certified, regulation-specific training.

7.1.8 Company-Required Environmental Training

Company-required environmental training is directed at proactively improving the environmental performance of the plant but is not mandated by regulation. This training can be task or position-specific or cover broad subject matter. One example of company-required environmental training at the facility is the Employee Environmental Awareness Training established under the plant's SEI Program. This program was developed by the Environmental Department and is being implemented by the Training Section. The objective of this program is to enhance employee environmental awareness on a plant-wide basis and establish a culture where employees become aware of and accountable for performing their work in accordance with corporate and plant environmental policies, objectives, and goals. An emphasis is placed throughout the presentation on identification of potential environmental problems and the employee's responsibilities for notification/communication of such problems.

7.2 **Environmental Communication Programs**

7.2.1 Monthly Meetings

7.2.2 Environmental Department Hotline

7.2.3 Ad Hoc Employees Environmental Meetings

7.2.4 Environmental Newsletter